

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Federal-State Joint Board on Universal)	CC Docket No. 96-45
Service)	
)	
Kingsgate Telephone, Inc. Petition for)	
Waiver of the Definition of "Study Area" in)	
the Appendix—Glossary of Part 36)	
)	

**DECLARATION OF DAVID WOODHAM ON BEHALF OF
CONSOLIDATED COMMUNICATIONS OF FORT BEND COMPANY
IN SUPPORT OF THE OPPOSITION TO
ETS' TELEPHONE'S PETITION FOR WAIVER**

1. I am David Woodham, Director of Sales - Texas for Consolidated Communications of Fort Bend Company and Consolidated Communications of Texas Company. I have 35 years of service with the company starting with the original Fort Bend Telephone Company.
2. The purpose of my declaration is to provide factual support for the Opposition of Consolidated Communications of Fort Bend Company to ETS Telephone's petition for Waiver of the Definition of Study Area under the rules of the Federal Communications Commission.
3. I have personal knowledge of all facts stated in my declaration.
4. I have reviewed ETS' Petition for Waiver filed at the Federal Communications Commission on September 17, 2014.

5. I am familiar with the areas where ETS operates and the geographic areas for which it seeks a waiver to create a new study area, as identified in Exhibit 2 to its Petition.

6. Attached to CCFB's Opposition is a list of the communities ETS identified in Exhibit 2 of its waiver petition that overlap with CCFB's ILEC Study Area.

7. Attached to CCFB's Opposition is a map showing the overlap between ETS' "study area" and CCFB's ILEC study area.

8. I am familiar with the areas where CCFB has deployed its telecommunications network facilities and its ability to extend its facilities to serve new developments on properties that were formerly vacant parcels of land.

9. With respect to the areas of CCFB's ILEC study area that ETS seeks to include in its study area (as identified on the attached map and in ETS' petition Exhibit 2, CCFB was ready, willing, and able to serve customers in those areas upon request, and had facilities in place capable of providing such service, dating back to ETS' first petition for a study areas waiver in 1996. CCFB remains willing to serve those areas today, and does serve customers in these areas when it receives requests for service.

10. The areas where CCFB's ILEC study area overlaps with ETS is in an area outside of Houston, Texas primarily bounded by I-10 to the north, route 1093 to the south, route 99 to the east and route 1463 to the west.

11. Attached to CCFB's Opposition are two maps from the National Broadband Map showing the area described in paragraph 10 above and the presence of Comcast and its unsubsidized cable modem broadband Internet access service in that area.

12. Declarant sayeth no more.

I declare under penalty of perjury that the foregoing is true and correct.

David Woodham

David Woodham

Director of Sales - Texas

Consolidated Communications of Fort Bend Company

Executed on: October 22, 2014

Conroe, Texas